



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

AFM/EHS/AA  
F. #2022R00315

271 Cadman Plaza East  
Brooklyn, New York 11201

October 27, 2023

By ECF and FedEx

Jeremy L. Gutman  
521 Fifth Avenue, 17th Floor  
New York, NY 10175  
212-644-5200  
jgutman@jeremygutman.com

Robert Michael Appleton  
Olshan, Frome & Wolosky LLC  
1325 Avenue of the Americas  
Ste 15th Floor  
New York, NY 10036  
212-451-2288  
rappleton@olshanlaw.com

Re: United States v. Sagar Singh, et al.  
Criminal Docket No. 23-236 (FB)

Dear Counsel:

Enclosed please find the government's discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. The discovery supplements the government's productions on August 18, 2023 and September 20, 2023. The government also requests reciprocal discovery from the defendant. In addition, the government has marked certain records as Sensitive Discovery Material, consistent with the Stipulation and Protective Order entered into on July 24, 2023. See ECF No. 28.

**I. The Government's Discovery**

<b>Bates Numbers</b>	<b>Description</b>
VILE_0000000269	Pertinent records from the Discord account belonging to Sagar Singh. This has been produced to all defendants and is marked as SENSITIVE DISCOVERY.
VILE_0000000270	Records received from Discord for the account belonging to Sagar Singh. This has been produced only to Sagar Singh and is marked as SENSITIVE DISCOVERY.

VILE_0000000279	Pertinent records from the Discord accounts belonging to Nicholas Ceraolo. This has been produced to all defendants and is marked as SENSITIVE DISCOVERY.
VILE_0000000280	Records received from Discord for the accounts belonging to Nicholas Ceraolo. This has been produced only to Nicholas Ceraolo and is marked as SENSITIVE DISCOVERY.
VILE_0000000281	Pertinent records from the Discord accounts belonging to the defendants' co-conspirators. This has been produced to all defendants and is marked as SENSITIVE DISCOVERY.
VILE_0000000271	Cellebrite extraction of the iPhone 11 belonging to Sagar Singh (Serial No. C7CCL3Z0N72J). This has been produced only to Sagar Singh and is marked as SENSITIVE DISCOVERY.
VILE_0000000274	Pertinent files from the iPhone 11 belonging to Sagar Singh (Serial No. C7CCL3Z0N72J). This has been produced to all defendants and is marked as SENSITIVE DISCOVERY.
VILE_0000000272	Cellebrite extraction of the iPhone 11 belonging to Sagar Singh (Serial No. 352904110592067). This has been produced only to Sagar Singh and is marked as SENSITIVE DISCOVERY.
VILE_0000000273	Pertinent files from the iPhone 11 belonging to Sagar Singh (Serial No. 352904110592067). This has been produced to all defendants and is marked as SENSITIVE DISCOVERY.
VILE_0000000275	Pertinent files from the Apple MacBook Pro Model A24A5 belonging to Sagar Singh. This has been produced to all defendants and is marked as SENSITIVE DISCOVERY.
VILE_0000000276	Extraction of the Apple MacBook Pro Model A24A5 belonging to Sagar Singh. This has been produced only to Sagar Singh and is marked as SENSITIVE DISCOVERY.
VILE_0000000277	Extraction of the MSI Laptop Model 9560NGW belonging to Sagar Singh. This has been produced only to Sagar Singh and is marked as SENSITIVE DISCOVERY.
VILE_0000000278	Pertinent files of the MSI Laptop Model 9560NGW belonging to Sagar Singh. This has been produced to all defendants and is marked as SENSITIVE DISCOVERY.
VILE_0000000282 – VILE_0000000283	Criminal history report for Nicholas Ceraolo. This has been produced to all defendants.
VILE_0000000284 – VILE_0000000314	An affidavit and warrant to search the Google and Discord accounts belonging to a co-conspirator. This has been produced to all defendants and is marked as SENSITIVE DISCOVERY.
VILE_0000000315 – VILE_0000000341	Photographs taken in connection with the search of a residence located on Campbell Street in Pawtucket, Rhode Island. This has been produced to all defendants.
VILE_0000000342 – VILE_0000000376	Photographs and videos taken in connection with the search of a residence located on 69th Avenue in Forest Hills, New York. This has been produced to all defendants.

Very truly yours,

BREON PEACE  
United States Attorney

By: /s/ Adam Amir  
Adam Amir  
Assistant U.S. Attorney  
(718) 254-6116

Enclosures

cc: Clerk of the Court (FB) (by ECF) (without enclosures)